

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

NOTICE OF MOTION

Case No. 19-CR-227

JOSEPH BONGIOVANNI,
PETER GERACE, JR.

Defendants.

UNITED STATES OF AMERICA,

v.

Case No. 23-CR-37

PETER GERACE, JR.,

Defendant.

PLEASE TAKE NOTICE that the undersigned will move this Court, at a date and time to be determined by this Court, for the following relief:

- (1) Clarification on Court's text Orders and amended scheduling Orders respecting timing and scope of pre-trial motions.
- (2) Reconsideration of Defendant Gerace's Motion to Suppress Cell Phone Evidence (Doc. 316) and related applications (Doc. 311, 312, 330, 341, 364, 368).
- (3) Such other and further relief as the Court deems proper.

Dated: June 6, 2023
Amherst, New York

Respectfully submitted,

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